

REMARKS

The Examiner is sincerely thanked for his clearly and carefully stated Office Action.

The claims presently outstanding are Claims 1-40. By the foregoing amendments, Claims 15 and 38-40 are sought to be amended to remove the informalities noted by the Examiner. These changes are believed not to introduce new matter, and their entry is respectfully requested.

The Examiner is thanked for noting the incorrectly cited priority application number, and the specification is sought to be amended accordingly.

A key point in the Office Action is the statement that "Huxley does not explicitly teach suspending of reads of pixel data during rendering of primitives only selectively...." The Examiner goes on to paraphrase what Huxley does teach, but note that the words "only selectively" are admittedly not met.

The question is then whether the art shows a motivation WHY a routineer should modify Huxley to meet this limitation. The Examiner has suggested that the motivation would be "so that the integrity of the data and the display are not compromised." However, this objective would also be achieved by Huxley, and there is no suggestion in the references relied on that Huxley is defective in this respect. Thus the suggested motivation would not lead to the suggested modification. Without such motivation, the rejection of Claim 1 amounts merely to impermissible hindsight reconstruction.

The words "only selectively" also appear in the different contexts of Claims 7 and 37, and the rejection of those independent claims is similarly defective.

Even in claims which have been rejected over the combination of Wang with Huxley, the general teaching regarding caching in Wang does

not remotely suggest the specific claimed relations. As an extreme example, the Examiner is urged to look again at the words of Claim 32: wherein a table is used to track said pixels with said unique identifier, said table comprising a first bit and a second bit and wherein said first bit flags all pixels whose information has not yet been updated or discarded and said second bit flags pixels which will be affected by said primitive to be rendered.

Even if the Examiner's general suggestions regarding modifications are accepted - which Applicants strongly disagree with - it seems astonishing and inconceivable that such general arguments would imply the very specific recitations of Claim 32.

This claim shows a general problem with stated rejections over Huxley and Wang: the stated motivations do not reach the claimed inventions.

Also, some of the Examiner's suggestions regarding technical combination seem to suggest that there may be some misunderstandings which could usefully be addressed in an interview, where particular teachings in the application and references could be pointed to.

Conclusion

Thus, all grounds of rejection and/or objection are traversed or accommodated, and favorable reconsideration and allowance are respectfully requested. The Examiner is requested to telephone the undersigned attorney for an interview to resolve any remaining issues.

Respectfully submitted,



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Version with Markings to Show Changes Made

In the Specification:

The paragraph beginning at line 3 of page 1 has been amended as follows:

This application claims priority from 60/109,733, [60/709,133,] filed 11/23/98, which is hereby incorporated by reference.

In the Claims:

15. (AMENDED) The method of Claim 12, wherein suspending and clearing steps are not performed if said primitive to be rendered appears in a history list of recently rendered primitive data.

38. (AMENDED) The subsystem [method] of Claim 37, wherein a table is used to determine if reads should be suspended.

39. (AMENDED) The subsystem [method] of Claim 37, wherein a table is used to determine if reads should be suspended, said table comprising a first bit and a second bit and wherein said first bit flags all pixels whose information has not yet been updated or discarded and said second bit flags pixels which will be affected by said primitive to be rendered.

40. (AMENDED) The subsystem [method] of Claim 37, wherein suspension of reads is invoked unless said primitive to be rendered appears in a history list of recently rendered primitive data.